

Inner City Press

April 9, 2021

By E-mail to HellersteinNYSDChambers@nysd.uscourts.gov

Hon. Alvin K. Hellerstein, United States District Judge
Southern District of New York, 500 Pearl Street New York, NY 10007

Re: Press application to unseal, with limited redactions if required, filings in US v. Coro, 19-cr-144 (AKH)

Dear Judge Hellerstein:

This concerns, in the above-captioned criminal case that relates inter alia to US sanctions on Venezuela, the complete sealing of filings - and now, the heavy redactions to and implications in the US Attorney's Office response of this afternoon (Docket No. 206).

Meaningful reply to the Government's argument is difficult at this point, as such much of it is redacted. For example, on Page 1, four lines and two full paragraphs after "During the conference, the Court" are redacted. Since the basis for redacting the Government's summary of or gloss on it is unclear.

But Inner City Press is immediately replying to the next unredacted statement in the Government response: "In what appears to have been a coordinated effort, on the same day, Matthew Russell Lee of the Inner City Press contacted the Court by email and requested the unsealing of several sealed documents."

Inner City Press routinely files requests to unseal in this District, and other Districts - including as cited in its March 31 request: US v. Weigand, 13-page order <https://www.documentcloud.org/documents/20536946-rakofforderonmrlicp> And "Judge Broderick's recent docketing of Inner City Press' request to unseal in US v. Ashe / Piao, 15-cr-706, Docket No 999 (Inner City Press letter) and Docket 998 (ordering that the sealing be justified or removed by April 9)."

Those requests, like this one, were not "coordinated" with anyone. Ascribing ulterior motives to press request for transparency is a hallmark of other regimes, like the one the US Attorney's Office claims to be so concerned about in this prosecution.

While under no obligation to disclose its communication in the course of its reporting, Inner City Press' first and thus far only contact with Mr. Coro's counsel was after the request, when she noted that AUSA Adelsberg's email address had been mis-spelled. (While cc-ed on the USAO response, no email has been yet been received).

We will coordinate to this degree: we ask for until April 13 to reply to the Government's new arguments and insinuations, and that this letter, like Docket No. 206, be docketed.

Respectfully submitted,

Matthew Russell Lee, Inner City Press

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